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June 25, 2021

Hon. Katherine Polk Failla
United States District Court
40 Foley Square, Room 2103
New York, New York 10007

Re: Walkie Check Productions, LLC v. Viacom CBS Inc. et al., Case No. 1:21-cv-01214-KPF

Dear Judge Failla:

We represent all Defendants in the above action. By memo endorsement dated May 21, 2021 (DE 27), the Court granted Plaintiff Walkie Check Productions, LLC's letter application to file certain materials under seal on its motion to disqualify this firm as Defendants' counsel. While we understood the scope of Walkie Check's sealing application to be limited to certain materials, Plaintiff's motion papers remain sealed in their entirety. As it is not clear to us which materials Plaintiff deems to be confidential, and to respect Plaintiff's concerns in that regard, Defendants respectfully request leave to provisionally file the entirety of our opposition papers under seal as well pursuant to Rule 9(C) of Your Honor's Individual Rules of Practice.

However, Defendants do not believe that a full sealing of the parties' motion papers is warranted in this matter. Upon conferring with Plaintiff's counsel, we will, with the Court's leave, apprise Your Honor accordingly with a request to unseal certain portions of the parties' filings.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Wook Hwang'.

Wook Hwang
Partner

cc: Plaintiff's counsel (via ECF)

Application GRANTED. Defendants' papers in opposition to the motion to disqualify may be filed under seal, visible only to the Court and the parties.

Dated: June 28, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE